

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>10-</u>
v.	:	DATE FILED: _____
ANGELA I. BORRELLI	:	VIOLATIONS:
	:	18 U.S.C. § 1344 (bank fraud - 1 count)
	:	18 U.S.C. § 1341 (mail fraud - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	

I N F O R M A T I O N

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times relevant to this information

1. Defendant ANGELA I. BORRELLI was employed by GF Management, Inc. ("GF Management") as an Assistant Corporate Controller in Philadelphia, Pennsylvania.
2. In that capacity, defendant ANGELA I. BORRELLI had access to the check stock and the computerized accounting system of GF Management and its subsidiaries.
3. GF Management was in the business of owning, operating and managing hotels around the United States. Among the hotels operated by GF Management was the Midwest Hotel and Conference Center in Columbus Ohio.
4. Commerce Bank (bank insurance no. 21140), Fifth Third Bank of Northeast Ohio (bank insurance no. 34000), Bank One - JP Morgan Chase (bank insurance no. 628), Bank of America (bank insurance no. 3510), PNC Bank (bank insurance no. 6384), SKY Bank, Salineville (bank insurance no. 14641), SKY Bank, Findlay (bank insurance no. 5982),

Michigan National Bank (bank insurance no. 22488), and Wachovia Bank (bank insurance no. 33869), were institutions the deposits of which were insured by the Federal Deposit Insurance Corporation.

5. Between on or about June 7, 2001, and in or about November 2007, in the Eastern District of Pennsylvania and elsewhere, defendant

ANGELA I. BORRELLI

knowingly executed and attempted to execute, and aided and abetted the execution of, a scheme to defraud Commerce Bank, Fifth Third Bank of Northeast Ohio, Bank One - JP Morgan Chase, Bank of America, PNC Bank, SKY Bank, Michigan National Bank, and Wachovia Bank, and to obtain money owned by and under the custody and control of those banks by means of false and fraudulent pretenses, representations and promises.

THE SCHEME

It was a part of the scheme that:

6. Defendant ANGELA I. BORRELLI used her position as Assistant Corporate Controller to obtain access to the computerized accounting system of GF Management and its subsidiaries for the purpose of entering false vendor names and invoices to make it appear that GF Management and its subsidiaries owed money to those false vendors.

7. Defendant ANGELA I. BORRELLI printed out checks on the bank accounts of GF Management and its subsidiaries to those false vendors in the amounts of the false invoices that she had fabricated in the accounting system. Those checks also bore as payee the name of BORRELLI's daughter, JJ.

8. As an authorized signer of checks of GF Management and its subsidiaries,

defendant ANGELA I. BORRELLI signed her own name to many of the false checks. On other occasions, defendant BORRELLI forged the signature of a different authorized signer. In addition, because the checks of GF Management and its subsidiaries required a second signature, BORRELLI forged the name of a second authorized signer.

9. The forged checks were drawn on accounts at Fifth Third Bank of Northeast Ohio, Bank One - JP Morgan Chase, Bank of America, PNC Bank, SKY Bank, Michigan National Bank, and Wachovia Bank.

10. Defendant ANGELA I. BORRELLI deposited the forged checks into a bank account in the name of defendant BORRELLI as custodian for her daughter, JJ, at Commerce Bank.

11. Defendant ANGELA I. BORRELLI withdrew funds from her daughter's account.

12. By this scheme, defendant ANGELA I. BORRELLI fraudulently withdrew approximately \$1,378,000 from accounts of GF Management and its subsidiaries to which she was not entitled, without the knowledge or consent of the account holders or the banks.

In violation of Title 18, United States Code, Sections 1344 and 2.

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 3 of Count One are incorporated here.

THE SCHEME

2. From on or about June 7, 2001, to on or about November, 2007, defendant

ANGELA I. BORRELLI

devised and intended to devise a scheme to defraud GF Management and its subsidiaries, and to obtain money and property from GF Management and its subsidiaries by means of knowingly false and fraudulent pretenses, representations and promises.

MANNER AND MEANS

It was part of the scheme that:

3. As Assistant Corporate Controller of GF Management, the defendant, ANGELA I. BORRELLI, prepared false and fraudulent checks on the accounts of GF Management and its subsidiaries for obligations that did not exist; deposited those checks in a bank account controlled by her as custodian for her daughter, JJ; and withdrew funds from that account for her own personal use.

4. As part of her employment, defendant ANGELA I. BORRELLI was responsible for preparing and causing to be delivered by commercial interstate carrier monthly financial reports about the Midwest Hotel and Conference Center. These financial reports were sent from GF Management in Philadelphia, Pennsylvania to Capmark Financial, Inc., in San Francisco, California.

5. In order to avoid detection of her preparation and cashing of false and fraudulent checks, and in order to permit her to continue to obtain funds belonging to GF Management and its subsidiaries to which she was not entitled, defendant ANGELA I. BORRELLI prepared a false financial report about the operations of the Midwest Hotel and Conference Center for the period of August 2007.

6. On or about September 10, 2007, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

ANGELA I. BORRELLI ,

for the purpose of executing the scheme described above, and attempting to do so, knowingly caused to be delivered by the commercial interstate carrier, according to the directions thereon, the false August 2007 monthly financial report for the Midwest Hotel and Conference Center from Philadelphia, Pennsylvania to San Francisco, California.

In violation of Title 18, United States Code, Sections 1341.

MICHAEL L. LEVY
United States Attorney_____
